

Larry Hilgeman  
Decora - Plant 3  
1491 Meridian Road  
Jasper, Indiana 47546

Re: Significant Source Modification No:  
**037-12132-00052**

Dear Mr. Hilgeman:

Decora - Plant 3 applied for a Part 70 operating permit on May 24, 1996 for a wood cabinet manufacturing source. An application to modify the source was received on April 4, 2000. Pursuant to 326 IAC 2-7-10.5, the following emission units are approved for construction at the source:

Finish Line B

- (a) One (1) surface coating booth, identified as SCB1-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC1-B.
- (b) One (1) surface coating booth, identified as SCB2-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC2-B.
- (c) One (1) surface coating booth, identified as SCB3-2, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC3-B.
- (d) One (1) surface coating booth, identified as SCB4-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC4-B.
- (e) One (1) surface coating booth, identified as SCB5-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC5-B.
- (f) Three (3) natural gas-fired ovens, identified as SC01-B, SC02-B and SC03-B rated at 0.500, 0.500 and 0.800 million British thermal units per hour, respectively, and three (3) electric infrared ovens, identified as IR1-B, IR2-B and IR3-B. (deemed insignificant activities)

The proposed Significant Source Modification approval will be incorporated into the pending Part 70 permit application pursuant to 326 IAC 2-7-10.5(l)(3). If there are no changes to the proposed construction of the emission units, the source may begin operating on the date that IDEM receives an affidavit of construction pursuant to 326 IAC 2-7-10.5(h). If there are any changes to the proposed construction the source can not operate until an Operation Permit Validation Letter is issued.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Mark L. Kramer, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

Attachments  
MLK/MES

cc: File - Dubois County  
U.S. EPA, Region V  
Dubois County Health Department  
Air Compliance Section Inspector - Gene Kelso  
Compliance Data Section - Mendy Jones  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

# **PART 70 SIGNIFICANT SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT**

**Decora - Plant 3  
1491 Meridian Road  
Jasper, Indiana 47546**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

|   |                |
|---|----------------|
| Source Modification No.: 037-12132-00052                                |                |
| Issued by:<br>Paul Dubenetzky, Branch Chief<br>Office of Air Management | Issuance Date: |

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## SECTION A

## SOURCE SUMMARY

This approval is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the emission units contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this approval pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates stationary wood cabinet manufacturing source.

Responsible Official: Kurt Wanninger  
Source Address: 1491 Meridian Road, Jasper, Indiana 47546  
Mailing Address: 1491 Meridian Road, Jasper, Indiana 47546  
Phone Number: 812-482-2527  
SIC Code: 2434 and 2517  
County Location: Dubois  
County Status: Maintenance for PM  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under PSD Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source is approved to construct and operate the following emission units and pollution control devices:

#### Finish Line B

- (a) One (1) surface coating booth, identified as SCB1-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC1-B.
- (b) One (1) surface coating booth, identified as SCB2-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC2-B.
- (c) One (1) surface coating booth, identified as SCB3-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC3-B.
- (d) One (1) surface coating booth, identified as SCB4-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC4-B.
- (e) One (1) surface coating booth, identified as SCB5-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC5-B.

- (f) Three (3) natural gas-fired ovens, identified as SC01-B, SC02-B and SC03-B rated at 0.500, 0.500 and 0.800 million British thermal units per hour, respectively, and three (3) electric infrared ovens, identified as IR1-B, IR2-B and IR3-B. (deemed insignificant activities)

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## **SECTION B                      GENERAL CONSTRUCTION CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

This approval to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2      Definitions [326 IAC 2-7-1]**

Terms in this approval shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### **B.3      Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

### **B.4      Revocation of Permits [326 IAC 2-1.1-9(5)][326 IAC 2-7-10.5(i)]**

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

### **B.5      Significant Source Modification [326 IAC 2-7-10.5(h)]**

This document shall also become the approval to operate pursuant to 326 IAC 2-7-10.5(h) when, prior to start of operation, the following requirements are met:

- (a) The attached affidavit of construction shall be submitted to the Office of Air Management (OAM), Permit Administration & Development Section, verifying that the emission units were constructed as proposed in the application. The emissions units covered in the Significant Source Modification approval may begin operating on the date the affidavit of construction is postmarked or hand delivered to IDEM if constructed as proposed.
- (b) If actual construction of the emissions units differs from the construction proposed in the application, the source may not begin operation until the source modification has been revised pursuant to 326 IAC 2-7-11 or 326 IAC 2-7-12 and an Operation Permit Validation Letter is issued.
- (c) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.
- (d) The Permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this document.

However, in the event that the Title V application is being processed at the same time as this application, the following additional procedures shall be followed for obtaining the right to operate:

- (1) If the Title V draft permit has not gone on public notice, then the change/addition covered by the Significant Source Modification will be included in the Title V draft.
- (2) If the Title V permit has gone thru final EPA proposal and would be issued ahead of the Significant Source Modification, the Significant Source Modification will go



thru a concurrent 45 day EPA review. Then the Significant Source Modification will be incorporated into the final Title V permit at the time of issuance.

- (3) If the Title V permit has not gone thru final EPA review and would be issued after the Significant Source Modification is issued, then the Modification would be added to the proposed Title V permit, and the Title V permit will issued after EPA review.

## SECTION C GENERAL OPERATION CONDITIONS

### C.1 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this approval or required by an applicable requirement, any application form, report, or compliance certification submitted under this approval shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

### C.2 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this approval, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days but no more than ninety (90) days after issuance of this approval, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM. IDEM, OAM, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

### C.3 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this approval.
- (b) Any application requesting an amendment or modification of this approval shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**C.4 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), visible emissions shall meet the following, unless otherwise stated in this approval:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

**C.5 Operation of Equipment [326 IAC 2-7-6(6)]**

Except as otherwise provided in this approval, all air pollution control equipment listed in this approval and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.6 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

**Testing Requirements [326 IAC 2-7-6(1)]**

**C.7 Performance Testing [326 IAC 3-6][326 IAC 2-1.1-11]**

- (a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this approval, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this approval, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAM, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### C.8 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

##### C.9 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM, when applicable). The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:
    - (A) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) If for reasons beyond its control, the Permittee fails to perform the monitoring and record keeping as required by Section D, then the reasons for this must be recorded.
  - (1) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent of the operating time in any quarter.
  - (2) Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

C.10 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this approval exceed the level specified in any condition of this approval, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the

affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate approval conditions may be grounds for immediate revocation of the approval to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

##### **C.11 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C- Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this approval shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this approval is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this approval.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

##### **C.12 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this approval;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this approval, and whether a deviation from an approval condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of approval issuance.

C.13 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) The reports required by conditions in Section D of this approval shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this approval, any notice, report, or other submission required by this approval shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.
- (c) Unless otherwise specified in this approval, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certi-

fication by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (d) The first report shall cover the period commencing on the date of issuance of this approval and ending on the last day of the reporting period.



## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]:

#### Finish Line B

- (a) One (1) surface coating booth, identified as SCB1-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC1-B.
- (b) One (1) surface coating booth, identified as SCB2-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC2-B.
- (c) One (1) surface coating booth, identified as SCB3-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC3-B.
- (d) One (1) surface coating booth, identified as SCB4-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC4-B.
- (e) One (1) surface coating booth, identified as SCB5-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC5-B.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

- (a) Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets in Finish Line B shall utilize one of the following application methods:

Airless Spray Application  
Air Assisted Airless Spray Application  
Electrostatic Spray Application  
Electrostatic Bell or Disc Application  
Heated Airless Spray Application  
Roller Coating  
Brush or Wipe Application  
Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

This Finish Line B consisting of five surface coating booths shall use less than 250 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2 (Particulate Emissions Limitations), the particulate matter (PM) emissions from the five (5) surface coating booths (SCB1-B through SCB5-B) shall be limited to 0.03 grains per dry standard cubic foot (dscf) for each booth, equivalent to 1.75 pounds per hour with a flow rate of 8,780 dry standard cubic feet per minute per booth.

D.1.4 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR 63, Subpart A]

The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

Pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), the wood furniture coating operations shall comply with the following conditions:

- (a) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
  - (1) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of eight-tenths (0.8) pound VHAP per pound solids; or
  - (2) Use compliant finishing materials in which all stains have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied.

Use compliant finishing materials in which all washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of eight-tenths (0.8) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
  - (3) Use a control device to limit emissions to eight-tenths (0.8) pound VHAP per pound solids; or
  - (4) Use a combination of (1), (2), and (3).
- (b) Limit VHAP emissions contact adhesives as follows:
  - (1) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed two-tenths (0.2) pounds VHAP per pound solids.
  - (2) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed two-tenths (0.2) pound VHAP per pound solids.

- (3) Use a control device to limit emissions to two-tenths (0.2) pound VHAP per pound solids.
- (c) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

A copy of this rule is attached.

**D.1.6 Work Practice Standards [40 CFR 63.803]**

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

**D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

**Compliance Determination Requirements**

**D.1.8 Volatile Organic Compounds (VOC)**

Compliance with the VOC usage and content limitations contained in Conditions D.1.2 and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.9 VOC Emissions**

Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.1.10 Particulate Matter (PM)**

The dry filters for PM control shall be in operation at all times when the five (5) surface coating booths (SCB1-B through SCB5-B) are in operation.

#### **D.1.11 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (SC1-B through SC5-B) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.12 Record Keeping Requirements**

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total VOC usage for each month; and
  - (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.13 Record Keeping Requirements (40 CFR 63, Subpart JJ)

- (a) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
  - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
  - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
  - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
  - (4) The VHAP content in weight percent of each thinner used.
  - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and thinners used to calculate the average.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.14 Reporting Requirements

- (a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) A semi-annual Continuous Compliance Report to document compliance with Condition D.1.5 and the Certification form, shall be submitted within thirty (30) days after the end of the six (6) months being reported.

The six (6) month periods shall cover the following months:

- (1) January 1 through June 30.
- (2) July 1 through December 31.
- (c) The reports required in (b) of this condition shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Decora - Plant 3  
Jasper, Indiana  
Permit Reviewer: MLK/MES

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Source Modification No. 037-12132-00052

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION  
CERTIFICATION**

Source Name: Decora - Plant 3  
Source Address: 1491 Meridian Road, Jasper, Indiana 47547  
Mailing Address: 1491 Meridian Road, Jasper, Indiana 47547  
Source Modification No.: 037-12132-00052

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.**

Please check what document is being certified:

- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**Part 70 Source Modification Quarterly Report**

Source Name: Decora - Plant 3  
Source Address: 1491 Meridian Road, Jasper, Indiana 47547  
Mailing Address: 1491 Meridian Road, Jasper, Indiana 47547  
Source Modification No.: 037-12132-00052  
Facilities: Five (5) surface coating booths, SCB1-B through SCB5-B (Finish Line B)  
Parameter: VOC delivered to the applicators  
Limit: Less than 250

YEAR: \_\_\_\_\_

| Month | VOC (tons) | VOC (tons)         | VOC (tons)     |
|-------|------------|--------------------|----------------|
|       | This Month | Previous 11 Months | 12 Month Total |
|       |            |                    |                |
|       |            |                    |                |
|       |            |                    |                |

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.  
Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_



**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR MANAGEMENT  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
Semi-Annual Report**

VOC and VHAP usage - Wood Furniture NESHAP

Source Name: Decora - Plant 3  
Source Address: 1491 Meridian Road, Jasper, Indiana 47547  
Mailing Address: 1491 Meridian Road, Jasper, Indiana 47547  
Source Modification No.: 037-12132-00052  
Facilities: Five (5) surface coating booths, SCB1-B through SCB5-B (Finish Line B)  
Parameters: VOC and VHAPs - NESHAP  
Limits: (1) Finishing operations - 1.0 lb VHAP/lb Solids for stains and 0.8 lb VHAP/lb Solids for washcoats, sealers, topcoats, basecoats and enamels.  
(2) Thinners used for on-site formulation of washcoats, basecoats and enamels - 3% VHAP content by weight  
(3) All other thinner mixtures - 10% VHAP content by weight  
(4) Foam adhesives meeting the upholstered seating flammability requirements - 0.2 lb VHAP/lb Solids  
(5) All other contact adhesives - 0.2 lb VHAP/lb Solids  
(6) Strippable spray booth material - 0.8 pounds VOC per pound solids

YEAR: \_\_\_\_\_

| Month | Finishing Operations<br>(lb VHAP/lb Solid) | Thinners used for on-site formulation<br>(% by weight) | All other thinner mixtures<br>(% by weight) | Foam adhesives (upholstered)<br>(lb VHAP/lb Solid) | Contact Adhesives<br>(lb VHAP/lb Solid) | Strippable Spray Booth Material<br>(lb VOC/lb Solid) |
|-------|--|--|---|--|---|--|
| 1     |  |  |   |  |   |  |
| 2     |  |  |   |  |   |  |
| 3     |  |  |   |  |   |  |
| 4     |  |  |   |  |   |  |
| 5     |  |  |   |  |   |  |
| 6     |  |  |   |  |   |  |

9 No deviation occurred in this six month period.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**Indiana Department of Environmental Management  
Office of Air Management**

**Technical Support Document (TSD) for a Part 70  
Significant Source Modification**

**Source Background and Description**

|   |  |
|---|--|
| <b>Source Name:</b>                         | <b>Decora - Plant 3</b>                          |
| <b>Source Location:</b>                     | <b>1491 Meridian Road, Jasper, Indiana 47546</b> |
| <b>County:</b>                              | <b>Dubois</b>                                    |
| <b>SIC Code:</b>                            | <b>2434 and 2517</b>                             |
| <b>Operation Permit No.:</b>                | <b>T 037-5928-00052</b>                          |
| <b>Operation Permit Issuance Date:</b>      | <b>Not Yet Issued</b>                            |
| <b>Significant Source Modification No.:</b> | <b>037-12132-00052</b>                           |
| <b>Permit Reviewer:</b>                     | <b>Mark L. Kramer</b>                            |

The Office of Air Management (OAM) has reviewed a modification application from Decora - Plant 3, relating to the construction of the following emission units and pollution control devices:

**Finish Line B:**

- (a) One (1) surface coating booth, identified as SCB1-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC1-B.
- (b) One (1) surface coating booth, identified as SCB2-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC2-B.
- (c) One (1) surface coating booth, identified as SCB3-2, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC3-B.
- (d) One (1) surface coating booth, identified as SCB4-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC4-B.
- (e) One (1) surface coating booth, identified as SCB5-B, using high volume low pressure (HVLP) spray guns and air assisted airless spray application, with emissions controlled by dry filters and exhausting to stack SC5-B.
- (f) Three (3) natural gas-fired ovens, identified as SC01-B, SC02-B and SC03-B rated at 0.500, 0.500 and 0.800 million British thermal units per hour, respectively, and three (3) electric infrared ovens, identified as IR1-B, IR2-B and IR3-B. (deemed insignificant activities)

## History

On April 4, 2000, Decora - Plant 3 submitted an application to the OAM requesting to add additional surface coating lines and insignificant combustion facilities to their existing plant.

Decora - Plant 3 was formerly known as Aristokraft Plant 3 Decora. The previous permits issued to the source had determined that the source was a major PSD source that did not go through PSD review. Subsequently, the existing source was assumed to have a two hundred and forty-nine (249) ton per year VOC emission limit. The latest modification through CP 037-8356, issued on August 27, 1997, had a VOC emission limit of 249 tons per year for a new conventional coating line which made the entire source major pursuant to 326 IAC 2-2. However, the original line has been removed with this proposed modification. The source is accepting a limit of less than 250 tons per year of VOC, therefore the source claims that the existing source should be considered a minor source prior to this modification. With this proposed modification, the source will be considered an existing major PSD source.

## Existing Approvals

The source applied for a Part 70 Operating Permit T 037-5928-00052 on May 24, 1996. The source has been operating under previous approvals including, but not limited to the following:

- (a) Permit # 19-03-90-0276, issued on March 31, 1986,
- (b) Permit # 19-03-90-0277, issued on March 31, 1986,
- (c) Permit not numbered, exemption letter, issued February 2, 1989,
- (d) Permit # 037-2600-00052, issued on June 24, 1992, and
- (e) Permit # CP 037-8356-00052, issued on August 27, 1999.

## Enforcement Issue

There are no enforcement actions pending.

## Stack Summary

| Stack ID               | Operation  | Height<br>(feet) | Diameter<br>(feet) | Flow Rate<br>(acfm) | Temperature<br>(EF) |
|------------------------|--|------------------|--------------------|---------------------|---------------------|
| SC1-B through<br>SC5-B | Five (5) Finish Line B<br>surface coating booths | 30               | 2.0                | 8,780               | 77                  |

## Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 4, 2000. Additional information was received on April 14, 2000.

## Emission Calculations

See pages 1 - 4 of 4 of Appendix A of this document for detailed emissions calculations.

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

| Pollutant        | Potential To Emit<br>(tons/year) |
|------------------|----------------------------------|
| PM               | 768                              |
| PM <sub>10</sub> | 768                              |
| SO <sub>2</sub>  | 0.005                            |
| VOC              | 9,503                            |
| CO               | 0.662                            |
| NO <sub>x</sub>  | 0.788                            |

| HAPs          | Potential To Emit<br>(tons/year) |
|---------------|----------------------------------|
| Xylene        | 304                              |
| Formaldehyde  | 1.88                             |
| Naphthalene   | 45.1                             |
| Ethyl Benzene | 61.8                             |
| Glycol Ethers | 471                              |
| TOTAL         | 883                              |

## Justification for Modification

- The Part 70 Operating Permit is being modified through a Part 70 Significant Source Modification to a yet to be issued Part 70 Operating Permit because the potential to emit before controls of this modification exceeds twenty five (25) tons per year. This modification is being performed pursuant to 326 IAC 2-7-10.5(f)(4).
- Since the Part 70 Operating Permit for this source has not been issued yet, the approval of this Significant Source Modification will allow the source to construct and operate.

### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAM emission data.

| Pollutant        | Actual Emissions<br>(tons/year) |
|------------------|---------------------------------|
| PM               | 0.026                           |
| PM <sub>10</sub> | 9.31                            |
| SO <sub>2</sub>  | 0.005                           |
| VOC              | 214                             |
| CO               | 0.298                           |
| NO <sub>x</sub>  | 1.19                            |
| DEHP             | 0.023                           |
| Cumene           | 0.032                           |
| Dibutylphthalate | 0.000001                        |
| Ethyl benzene    | 0.607                           |
| Formaldehyde     | 0.153                           |
| Methanol         | 0.284                           |
| MEK              | 2.56                            |
| MIBK             | 0.498                           |
| Naphthalene      | 0.009                           |
| Toluene          | 5.87                            |
| Xylene           | 2.95                            |
| Glycol Ethers    | 0.080                           |

### County Attainment Status

The source is located in Dubois County.

| Pollutant        | Status     |
|------------------|------------|
| PM <sub>10</sub> | attainment |
| SO <sub>2</sub>  | attainment |
| NO <sub>2</sub>  | attainment |
| Ozone            | attainment |
| CO               | attainment |
| Lead             | attainment |

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Dubois County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Dubois County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions

Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

| Pollutant        | Emissions<br>(tons/year) |
|------------------|--------------------------|
| PM               | 99.0                     |
| PM <sub>10</sub> | 99.0                     |
| SO <sub>2</sub>  | 0.10                     |
| VOC              | 249                      |
| CO               | 2.10                     |
| NO <sub>x</sub>  | 9.80                     |

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon Addendum to The Technical Support Document for CP 037-8356.

#### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

|                       | <b>Potential to Emit (tons/year)</b> |                  |                 |               |       |                 |      |
|-----------------------|--------------------------------------|------------------|-----------------|---------------|-------|-----------------|------|
| Process/facility      | PM                                   | PM <sub>10</sub> | SO <sub>2</sub> | VOC           | CO    | NO <sub>x</sub> | HAPs |
| Proposed Modification | 4.05                                 | 4.09             | 0.005           | less than 250 | 0.662 | 0.788           | 23.1 |
| PSD Threshold Level   | 250                                  | 250              | 250             | 250           | 250   | 250             | -    |

The HAPs potential to emit, reflecting all limits, of the significant emission units after controls are as follows:

| HAPs          | Potential To Emit (tons/year) |
|---------------|-------------------------------|
| Xylene        | 7.97                          |
| Formaldehyde  | 0.049                         |
| Naphthalene   | 1.18                          |
| Ethyl Benzene | 1.62                          |
| Glycol Ethers | 12.3                          |
| TOTAL         | 23.1                          |

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

| Entire Source | VOC Potential To Emit (tons/year) |
|---------------|-----------------------------------|
| Existing      | 249                               |
| Proposed      | less than 250                     |

Therefore, the proposed modification to this existing minor PSD source now makes this source a major PSD source pursuant to 326 IAC 2-2.

### Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T 037-5928-00052) application on May 24, 1996. The addition of Finished Line B being reviewed under this permit shall be incorporated in the submitted Part 70 application.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

- (b) Even prior to this modification, the source was subject to the National Emission Standards for Hazardous Air Pollutants from Wood Furniture Manufacturing Operations, 326 IAC 14, (40 CFR 63.800, Subpart JJ. The provisions of 40 CFR 63 Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63 Subpart JJ. A copy of the rule is attached.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 2-4.1-1 (New source toxics control)**

The potential HAPs emissions from the proposed finish line exceed the major source levels of ten (10) tons per year for a single HAP and twenty five (25) tons per year for the combination of HAPs. Compliance with NESHAP Subpart JJ requirements shall satisfy the requirements of 326 IAC 2-4.1-1.

#### **326 IAC 8-2-12 (Surface coating emission limitations: wood furniture and cabinet coating)**

The surface coating operations are subject to the requirements of 326 IAC 8-2-12 since the coatings are being applied to solid wood, wood composition or simulate wood in the production of wood cabinets. Pursuant to 326 IAC 8-2-12, the proposed HVLP spray applicators used in the five (5) coating booths comply with this rule.

#### **326 IAC 6-3-2 (Process Operations)**

The particulate matter (PM) from the five (5) surface coating booths shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The dry filters shall be in operation at all times that the surface coating booths are in operation, in order to comply with this limit.

### **State Rule Applicability - Insignificant Activities**

There are no specific rules for the insignificant combustion facilities less than ten (10) million British thermal units per hour, each.

### **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.



Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

The five (5) surface coating booths have applicable compliance monitoring conditions as specified below:

- (a) The dry filters for PM control shall be in operation at all times when any of the five (5) spray booths are in operation.
- (b) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating spray booth Stacks 1 through 5 while one or more of the spray booths are in operation.
- (c) Monthly inspections shall be performed of the coating emissions from the stacks and the presence of overspray on the rooftops and the nearby ground.

These monitoring conditions are necessary because the dry filters must operate properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

## **Conclusion**

The construction and operation of the Finish Line B shall be subject to the conditions of the attached proposed Significant Source Modification No. 037-12132-00052.

Revised June 6, 2000

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 4 TSD Addendum

**Company Name: Decora - Plant 3**  
**Address City IN Zip: 1491 Meridian Road, Jasper, Indiana 47546**  
**Source Modification No: 037-12132**  
**Plt ID: 037-00052**  
**Reviewer: Mark L. Kramer**  
**Date: April 4, 2000**

| Material                     | Density<br>(lbs/gal) | Weight %<br>Volatile (H2O &<br>Organics) | Weight %<br>Water | Weight %<br>Organics | Volume %<br>Water | Volume %<br>Non-Volatiles<br>(solids) | Gal of Mat.<br>(gal/unit) | Maximum<br>(units/hour) | Pounds VOC per<br>gallon of coating<br>less water | Pounds VOC per<br>gallon of coating | Potential VOC<br>(pounds per<br>hour) | Potential VOC<br>(pounds per day) | Potential VOC<br>(tons per year) | Particulate Potential<br>(tons/yr) | lbs VOC/gal<br>solids | Transfer<br>Efficiency |
|------------------------------|----------------------|--|-------------------|----------------------|-------------------|---------------------------------------|---------------------------|-------------------------|---|-------------------------------------|---------------------------------------|-----------------------------------|----------------------------------|------------------------------------|-----------------------|------------------------|
| Eggshell Durasyn Topcoat     | 9.59                 | 52.00%                                   | 0.0%              | 52.0%                | 0.0%              | 48.00%                                | 0.04320                   | 240.000                 | 4.99  | 4.99                                | 51.70                                 | 1240.88                           | 226.46                           | 52.26                              | 10.39                 | 75%                    |
| Durasyn Sealer (AUS0209)     | 7.59                 | 74.17%                                   | 24.9%             | 49.3%                | 0.0%              | 25.83%                                | 0.72800                   | 240.000                 | 3.74  | 3.74                                | 653.38                                | 15681.16                          | 2861.81                          | 375.08                             | 14.48                 | 75%                    |
| White Primer (AUW0257)       | 9.42                 | 52.60%                                   | 0.0%              | 52.6%                | 0.0%              | 47.40%                                | 0.10160                   | 240.000                 | 4.95  | 4.95                                | 120.82                                | 2899.70                           | 529.19                           | 119.22                             | 10.45                 | 75%                    |
| Satin Wiping Stain (AYW0030) | 7.58                 | 79.29%                                   | 0.0%              | 79.3%                | 0.0%              | 20.71%                                | 0.47200                   | 240.000                 | 6.01  | 6.01                                | 680.83                                | 16340.00                          | 2982.05                          | 194.72                             | 29.02                 | 75%                    |
| Sienna Toner (NAB0547)       | 6.92                 | 96.82%                                   | 10.8%             | 86.0%                | 0.0%              | 3.18%                                 | 0.46400                   | 240.000                 | 5.95  | 5.95                                | 662.88                                | 15909.11                          | 2903.41                          | 26.83                              | 187.19                | 75%                    |

PM Control Efficiency 95.00%

**State Potential Emissions**

**Add worst case coating to all solvents**

**Uncontrolled**  
**Controlled**

**2169.62**  
**2169.62**

**52070.85**  
**52070.85**

**9502.93**  
**9502.93**

**768.12**  
**38.41**

**Limited VOC 249 tons per year**

**Controlled and Limited**

**249.00**

**1.01**

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)

Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)

Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)

Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)

Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)

Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \* (8760 hrs/yr) \* (1 ton/2000 lbs)

Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)

Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations  
HAP Emission Calculations

Company Name: Decora - Plant 3  
Address City IN Zip: 1491 Meridian Road, Jasper, Indiana 47546  
Source Modification No: 037-12132  
Plt ID: 037-00052  
Reviewer: Mark L. Kramer  
Date: April 4, 2000

| Material                     | Density<br>(lbs/gal) | Gallons of<br>Material<br>(gal/unit) | Maximum<br>(unit/hour) | Weight %<br>Xylene | Weight %<br>Formaldehyde | Weight %<br>Naphthalene | Weight %<br>Ethyl<br>Benzene | Weight %<br>Glycol Ethers | Weight % | Weight %      | Xylene<br>Emissions<br>(tons/yr) | Formaldehyde<br>Emissions<br>(tons/yr) | Naphthalene<br>Emissions<br>(tons/yr) | Ethyl<br>Benzene<br>Emissions<br>(tons/yr) | Glycol<br>Ethers<br>Emissions<br>(tons/yr) | (tons/yr) | (tons/yr) |
|------------------------------|----------------------|--------------------------------------|------------------------|--------------------|--------------------------|-------------------------|------------------------------|---------------------------|----------|---------------|----------------------------------|--|---------------------------------------|--|--|-----------|-----------|
| Eggshell Durasyn Topcoat     | 9.59                 | 0.04320                              | 240.000                | 33.20%             | 0.20%                    | 0.00%                   | 6.80%                        | 0.00%                     |          |               | 144.59                           | 0.87                                   | 0.00                                  | 29.61                                      | 0.00                                       | 0.00      | 0.00      |
| Durasyn Sealer (AUS0209)     | 7.59                 | 0.72800                              | 240.000                | 0.00%              | 0.00%                    | 0.00%                   | 0.00%                        | 4.50%                     |          |               | 0.00                             | 0.00                                   | 0.00                                  | 0.00                                       | 261.38                                     | 0.00      | 0.00      |
| White Primer (AUW0257)       | 9.42                 | 0.10160                              | 240.000                | 15.80%             | 0.10%                    | 0.00%                   | 3.20%                        | 0.00%                     |          |               | 158.96                           | 1.01                                   | 0.00                                  | 32.19                                      | 0.00                                       | 0.00      | 0.00      |
| Satin Wiping Stain (AYW0030) | 7.58                 | 0.47200                              | 240.000                | 0.00%              | 0.00%                    | 1.20%                   | 0.00%                        | 0.00%                     |          |               | 0.00                             | 0.00                                   | 45.13                                 | 0.00                                       | 0.00                                       | 0.00      | 0.00      |
| Sienna Toner (NAB0547)       | 6.92                 | 0.46400                              | 240.000                | 0.00%              | 0.00%                    | 0.00%                   | 0.00%                        | 6.20%                     |          |               | 0.00                             | 0.00                                   | 0.00                                  | 0.00                                       | 209.27                                     | 0.00      | 0.00      |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          |               |                                  |  |                                       |  |  |           |           |
|                              |                      |                                      |                        |                    |                          |                         |                              |                           |          | Single Total  | 303.5                            | 1.88                                   | 45.13                                 | 61.808                                     | 470.65                                     | 0.00      | 0.000     |
| METHODOLOGY                  |                      |                                      |                        |                    |                          |                         |                              |                           |          | Overall Total | 883.0                            |  |                                       |  |  |           |           |

Limited by Ratio of VOC Limit to VOC PTE (249/9503) Single Total 7.95 0.05 1.18 1.62 12.33 0.00 0.00  
Overall Total 23.14

HAPS emission rate (tons/yr) = Density (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

**Company Name:** Decora - Plant 3  
**Address City IN Zip:** 1491 Meridian Road, Jasper, Indiana 47546  
**Source Modification No:** 037-12132  
**Pit ID:** 037-00052  
**Reviewer:** Mark L. Kramer  
**Date:** April 4, 2000

**Insignificant Activities**  
**Three Natural Gas Combustion Units**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

1.80

15.77

| Emission Factor in lb/MMCF    | Pollutant |       |       |             |       |       |
|-------------------------------|-----------|-------|-------|-------------|-------|-------|
|                               | PM*       | PM10* | SO2   | NOx         | VOC   | CO    |
|                               | 1.9       | 7.6   | 0.6   | 100.0       | 5.5   | 84.0  |
| Potential Emission in tons/yr | 0.015     | 0.060 | 0.005 | **see below | 0.043 | 0.662 |

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

**Methodology**

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

**Appendix A: Emissions Calculations**  
**Natural Gas Combustion Only**  
**MM BTU/HR <100**

Page 4 of 4 TSD App A

**HAPs Emissions**

**Company Name: Decora - Plant 3**  
**Address City IN Zip: 1491 Meridian Road, Jasper, Indiana 47546**  
**Source Modification No: 037-12132**  
**Plt ID: 037-00052**  
**Reviewer: Mark L. Kramer**  
**Date: April 4, 2000**

HAPs - Organics

| Emission Factor in lb/MMcf    | Benzene<br>2.1E-03 | Dichlorobenzene<br>1.2E-03 | Formaldehyde<br>7.5E-02 | Hexane<br>1.8E+00 | Toluene<br>3.4E-03 |
|-------------------------------|--------------------|----------------------------|-------------------------|-------------------|--------------------|
| Potential Emission in tons/yr | 1.656E-05          | 9.461E-06                  | 5.913E-04               | 1.419E-02         | 2.681E-05          |

HAPs - Metals

| Emission Factor in lb/MMcf    | Lead<br>5.0E-04 | Cadmium<br>1.1E-03 | Chromium<br>1.4E-03 | Manganese<br>3.8E-04 | Nickel<br>2.1E-03 |
|-------------------------------|-----------------|--------------------|---------------------|----------------------|-------------------|
| Potential Emission in tons/yr | 3.942E-06       | 8.672E-06          | 1.104E-05           | 2.996E-06            | 1.656E-05         |

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.  
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.